UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA))
v.) CRIMINAL NO. 1-13-cr-10069
JODI KILDAY, Defendant))

<u>DEFENDANT'S MOTION FOR</u> CONTINUED RELEASE PENDING SENTENCING

Now comes Defendant Jodi Kilday ("Defendant" or "Kilday") and moves this Honorable Court to continue her release pending sentencing, on the same terms and conditions established for her pre-trial release. In support of her continued release, Kilday avers that there are "exceptional reasons why [her] detention would not be appropriate." 18 U.S.C. §3145(c).

Procedural Background

Ms. Kilday was arrested on January 28, 2013, on a complaint charging her with conspiracy to distribute oxycodone. She was brought before the Court and released on conditions. She was indicted on March 14, 2013, for conspiring to possess with intent to distribute and to distribute oxycodone, and subsequently entered a plea of not guilty. On November 6, 2013, at the conclusion of pre-trial proceedings before the Magistrate Judge, the case was transferred to the District Court. On March 19, 2014, the parties appeared before the Court for pre-trial conference. Defendant was given until April 25, 2014, to further evaluate the viability of a motion to suppress, and scheduled a further pre-trial conference, or Rule 11 hearing, for May 5, 2014. On April 23, 2014, the parties filed a status report in which Defendant indicated her intention to plead guilty.

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